

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN**

In re)
CITY OF DETROIT, MICHIGAN,) Chapter 9
Debtor.)
) Case No. 13-53846
) Hon. Steven W. Rhodes
)
)

PRELIMINARY RESPONSE TO CITY OF DETROIT'S OBJECTIONS AND RESPONSES TO REQUEST FOR PRODUCTION OF DOCUMENTS

Dexia Crédit Local and Dexia Holdings, Inc. (collectively, “Dexia”) by their undersigned attorneys, submit this preliminary response to the City of Detroit, Michigan’s (the “City”) objections and responses to the *Dexia’s First Request for the Production of Documents to the City of Detroit in Connection with the Amended Plan for the Adjustment of Debts* served by Dexia on April 11, 2014 (“Document Requests”) [Docket No. 4037].

I. THE CITY'S INCORPORATION OF GENERAL OBJECTIONS

The City incorporates 21 “General Objections” into each of its responses to Dexia’s Document Requests. Based upon conversations with the City’s counsel, and notwithstanding the incorporation of the General Objections into each of the City’s responses to the Document Requests, it is Dexia’s understanding that the City has not withheld any documents on the basis of a General Objection except for (a) expert disclosure, (b) attorney-client privilege, (c) mediation privilege, and/or (d) personal privacy or commercial sensitivity issues.

II. INDEXING AND IDENTIFICATION OF DOCUMENTS

On May 7, 2014, the City produced over 250,000 pages of documents. However, the City did not provide an index describing the documents, a list of categories of documents, or

make any other effort to organize the documents. The City should be required (a) to provide an index of the documents produced, and (b) to identify which documents (by bates numbers) are responsive to which of the individual Document Requests of the individual party making such requests. Until such index and identification is provided by the City, and Dexia is afforded a reasonable opportunity to review the documents with that information, it is impossible for Dexia to determine whether the City's production is responsive to the Document Requests.

III. RESERVATION OF RIGHTS

Pending receipt of the foregoing, Dexia reserves the right to file a supplemental response identifying specific shortcomings, if any, in the City's response to the Document Requests.

Dated: May 11, 2014.

Respectfully submitted,

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CERTIFICATION OF SERVICE

I, Regina Drouillard, hereby certify that on May 11, 2014, I electronically filed the following:

- Preliminary Response to City of Detroit's Objections and Responses to Request for Production of Documents

with the Clerk of the Court using the ECF and I hereby certify that the Court's ECF system has served all registered users.

ALLARD & FISH, P.C.

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Dated: May 11, 2014